

BORIS FELDMAN, State Bar No. 128838
Email: boris.feldman@wsgr.com
ELIZABETH C. PETERSON, State Bar No. 194561
Email: epeterson@wsgr.com
WILSON SONSINI GOODRICH & ROSATI
Professional Corporation
650 Page Mill Road
Palo Alto, CA 94304-1050
Telephone: (650) 493-9300
Facsimile: (650) 565-5100

*Attorneys for Defendants Larry Page, Sergey
Brin, Eric E. Schmidt, L. John Doerr, John L.
Hennessy, Ann Mather, Paul S. Otellini, K. Ram
Shriram, Shirley M. Tilghman and Nominal
Defendant Google Inc.*

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
OAKLAND DIVISION

In re GOOGLE INC. SHAREHOLDER
DERIVATIVE LITIGATION

) Master File No. CV-11-04248-PJH
)
)

)
) This Document Relates To:
)

) ALL ACTIONS.
)

) CITY OF ORLANDO POLICE PENSION
) FUND by Its Trustees, derivatively on behalf
) of GOOGLE INC.,
)

) Case No. CV-13-02038-PJH
)

) Plaintiffs,
)

) STIPULATION AND [PROPOSED] ORDER
) REGARDING PROCEEDINGS ON REVIEW
) OF SETTLEMENT
)

) vs.
)

) LAWRENCE E. PAGE, et al.,
)

) Defendants.
)

) and
)

) GOOGLE INC., a Delaware corporation,
) Nominal Defendant.
)
)

1 WHEREAS, on August 7, 2014, the Settling Parties executed a Stipulation of Settlement
2 and filed a Motion for Preliminary Approval of the Proposed Derivative Settlement in these
3 proceedings;

4 NOW, THEREFORE, subject to Court approval, the Settling Parties agree as follows:

- 5 1. After review of the preliminary approval papers, the Court will either enter the
6 preliminary approval and scheduling order submitted with those papers, or will
7 schedule a hearing on preliminary approval at a time to be specified by the Court.
- 8 2. Pursuant to the Stipulation of Settlement, all pending motions in the action
9 captioned *In re Google Inc. Shareholder Derivative Litigation*, No. 11-CV-4248-
10 PJH, including Defendants' pending Motion to Dismiss the Second Amended
11 Complaint filed on December 6, 2013 (Dkt. No. 105) and, in *City of Orlando*
12 *Police Pension Fund v. Page, et al.*, Case No. 13-CV-2038-PJH, Defendants'
13 Motion for Summary Judgment filed on November 1, 2013 (Dkt. No. 43) together
14 with all papers submitted in support or in opposition thereto, are hereby
15 withdrawn *ab initio*, and any materials filed under seal in connection with such
16 motions, as well as the documents filed by Defendants with the Court *in camera*
17 on February 24, 2014, shall be returned by the Clerk of the Court to the party that
18 submitted such materials.

1 DATED: August 7, 2014

WILSON SONSINI GOODRICH &
ROSATI, P.C.
BORIS FELDMAN
ELIZABETH C. PETERSON

4 s/ Boris Feldman
BORIS FELDMAN

650 Page Mill Road
Palo Alto, CA 94304
Telephone: 650/493-9300
650/493-6811 (fax)

Attorneys for Defendants Larry Page, Sergey
Brin, Eric E. Schmidt, L. John Doerr, John L.
Hennessey, Ann Mather, Paul S. Otellini, K. Ram
Shriram, Shirley M. Tilghman, and Nominal
Defendant Google Inc.

11 DATED: August 7, 2014

ROBBINS GELLER RUDMAN
& DOWD LLP
BENNY C. GOODMAN III
ERIK W. LUEDEKE

14 /s Benny C. Goodman III
BENNY C. GOODMAN III

655 West Broadway, Suite 1900
San Diego, CA 92101-3301
Telephone: 619/231-1058
619/231-7423 (fax)

ROBBINS GELLER RUDMAN
& DOWD LLP
SHAWN A. WILLIAMS
Post Montgomery Center
One Montgomery Street, Suite 1800
San Francisco, CA 94104
Telephone: 415/288-4545
415/288-4534 (fax)

POMERANTZ LLP
MARC I. GROSS
JEREMY A. LIEBERMAN
600 Third Avenue
New York, NY 10016
Telephone: 212/661-1100
212/661-8665 (fax)

1 ROBBINS ARROYO LLP
2 BRIAN J. ROBBINS
3 FELIPE J. ARROYO
4 SHANE P. SANDERS
5 GINA STASSI
600 B Street, Suite 1900
San Diego, CA 92101
Telephone: 619/525-3990
619/525-3991 (fax)

6 LAW OFFICE OF ALFRED G.
7 YATES, JR., P.C.
8 GERALD L. RUTLEDGE
519 Allegheny Building
429 Forbes Avenue
Pittsburgh, PA 15219
Telephone: 412/391-5164
412/471-1033 (fax)

10 Counsel for Plaintiffs Patricia H. McKenna,
11 Avrohom Gallis and James Clem

12 DATED: August 7, 2014

13 ABRAHAM, FRUCHTER,
14 & TWERSKY, LLP
JEFFREY S. ABRAHAM
MITCHELL M.Z. TWERSKY
PHILIP T. TAYLOR

15
16 /s Jeffrey S. Abraham
JEFFREY S. ABRAHAM

17 One Penn Plaza, Suite 2805
18 New York, NY 10119
19 Telephone: 212/279-5050
212/279-3655 (fax)

20 ABRAHAM, FRUCHTER,
21 & TWERSKY, LLP
IAN D. BERG
22 TAKEO A. KELLAR
12526 High Bluff Drive, Suite 300
San Diego, California 92130
23 Tel: (858) 792-3448
Fax: (858) 792-3449
24 lberg@aftlaw.com
tkellar@aftlaw.com

25 Counsel for Plaintiff City of Orlando Police
26 Pension Fund
27
28

1 I, Elizabeth C. Peterson, am the ECF user whose ID and password are being used to file
2 this STIPULATION AND [PROPOSED] ORDER REGARDING PROCEEDINGS ON
3 REVIEW OF SETTLEMENT. In compliance with Civil L.R. 5-1, I hereby attest that Boris
4 Feldman, Benny C. Goodman III, and Jeffrey S. Abraham have concurred in this filing.

5
6 s/ Elizabeth C. Peterson
Elizabeth C. Peterson

ORDER

Pursuant to the Stipulation, IT IS SO ORDERED.

DATED: _____

THE HONORABLE PHYLLIS J. HAMILTON
UNITED STATES DISTRICT JUDGE